

18 JUN 2008

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article No. 7006 2760 0000 8650 5460

Juan Somoano  
Glenn Springs Holdings, Inc.  
5005 LBJ Freeway  
Dallas, Texas 75244

Dear Mr. Somoano:

Re: Request for Occidental Chemicals (OCC) SWMU and AOC Database  
RCRA ID #KSD007482029.

The Environmental Protection Agency (EPA) and the Kansas Department of Health & Environment (KDHE) have reviewed the facility records covering spills, releases, and sampling results from water, soil and sediment. In addition, OCC will begin their onsite field investigation in 2008, which will generate vast amounts of new environmental data.

In earlier correspondence between EPA and OCC, OCC has claimed that much of the historical information is either missing or not available. EPA recently visited the National Response Center (NRC) Spill Line database maintained by the U.S. Coast Guard and identified over 500 releases and/or spills between 1992-2007 that were reported by Vulcan Chemicals, Basic Chemicals (owned by OCC) or OCC.

The OCC RCRA permit requires OCC to notify EPA in the event of physical changes at the facility within 20 calendar days prior to the "planned physical changes". Examples of physical changes at the plant include the closure of the asbestos surface impoundment SWMU, Pentachlorophenol Unit (approximately 112 tons of pentachlorophenol waste and debris was generated and disposed of in 2006) and the 2 million gallon sodium hydroxide storage tank construction (soil was excavated to a depth of 12 inches, analyzed as non-hazardous and disposed of as a special waste, with no notification provided to either EPA or KDHE). EPA learned of these changes 9 months to 2 years after they were closed, taken out of service or after the work was begun. No environmental sampling was conducted to determine either delineation of contaminants or identification of contaminants at these sites. This information would have been valuable in conducting the onsite investigation to address onsite contamination that may be contributing to the offsite groundwater contamination.

RCAP *GH*  
GARRETT  
06/13/08

RCAP *GH*  
GRAVATT  
06/16/08

CNSL *GH*  
JOHNSON  
06/16/08

RCAP  
SLUGANTZ  
06/17/08

*LSueck*

487200



RCRA

EPA believes that it is necessary for OCC to construct a multi-purpose database for use by OCC, KDHE and EPA. EPA has found that databases incorporating the following features can be quite beneficial to not only the regulators, but also the facility owner and consultants. OCC may currently have a database that satisfies some of the features noted below. EPA and KDHE welcome the opportunity to discuss with OCC potential database features that would benefit all interested parties as we work together to remediate the site. Below is an example of a useful and user-friendly database

1. Retain and manage analytical data
  - Soil, sediment, groundwater and surface water characterization.
  - The historical, current and future data would differentiate laboratory results and detection limits.
2. Facilitate evaluation and analysis
  - Screening against soil and water evaluation criteria (PRGs, RSKs, MCLs, etc.).
  - Data output would be available for statistical analysis.
  - The analytical data would be available for presentation in tables and charts.
  - Decisions regarding future corrective measures could be facilitated through use of this database.
3. Track SWMUs and AOCs to closure
  - Spreadsheet-based SWMU, AOC, and Process Area Tracking
  - Descriptive information for SWMUs/AOCs, tanks, sumps, lagoons, impoundments, etc.
  - Hazardous waste status of SWMUs, AOCs, tanks, sumps, lagoons, impoundments, etc.
  - Soil Evaluation Criteria (SEC) exceedence list for SWMUs/AOCs, tanks, sumps, lagoons, and impoundments.
  - Listing of SWMU/AOC, tanks, sumps, lagoons, impoundments group groundwater monitoring wells, extractions wells, underground injection control wells and piezometers
    - Document monitoring wells containing LNAPL and DNAPL
  - Documents status of investigation, Corrective Measures, Closure, and Remedies
  - Database designed to track and update progress towards closure
  - Soil, sediment, surface and groundwater sample locations, differentiation in regards to samples exceeding SEC value and PQL
4. Two databases
  - Microsoft Access database of analytical results
    - Manage large amount of analytical data
    - Filter, sort and screen results for output
    - Data warehouse providing results for output
    - Sample analytical values, analytical methods and PQL
    - Sample descriptors: identification/name, dates, depths, matrix (soil, water, waste characterization, etc.)
    - Sample: AOC, SWMU, SWMU Group, Processing Area, etc.
    - Screening values

- Excel spreadsheet for SWMU/AOC tracking
  - Easily understood, user friendly, input and tracking database
  - Compile descriptive information
  - Track status and progress for eventual regulatory closure
  - Spreadsheet output filtered by characteristics and/or location and /or SEC exceedence
  - Evaluates PQL against SEC when value is non-detect (ND)
  - Designed for continued input of both historical and future data.

5. Summary

- Dual database
  - Analytical results and SWMU, AOC, tanks, sumps, lagoons, impoundments, etc tracking
- Evaluates data for SEC exceedances
  - Results and PQLs
  - Output for evaluation analysis by facility, consultants & regulators
- Tracks status of SWMUs, AOCs, tanks, sumps, lagoons, impoundments, etc to closure
- Tool for tracking and reporting

EPA would welcome the opportunity to discuss with OCC in more detail the corrective action potential and benefits to both OCC and the regulating community. Please contact the EPA after OCC has reviewed this letter to discuss further options.

If you have any questions you may reach me at (913) 551-7159 or at [Garrett.David@epa.gov](mailto:Garrett.David@epa.gov).

Sincerely,

David Garrett  
 Environmental Scientist  
 RCRA Corrective Action & Permits Branch  
 Air & Waste Management Division

cc: Lisa Thurman  
 Occidental Chemicals  
 Devin Pollock  
 KDHE-BWM

AWMD/RCAP:cas:h:/DGARRETT/OCC-SWMU-AOCDATABASELETTERV3.DOC/061108



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

**18 JUN 2008**

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

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Juan Somoano  
Glenn Springs Holdings, Inc.  
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Sincerely,



David Garrett  
Environmental Scientist  
RCRA Corrective Action & Permits Branch  
Air & Waste Management Division

cc: Lisa Thurman  
Occidental Chemicals  
Devin Pollock  
KDHE-BWM

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Juan Somoano  
Glenn Springs Holdings, Inc.  
5005 LBJ Freeway  
Dallas, TX 75244

2. Article Number

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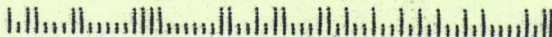
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JUN 23 2008

Garrett-RCAP





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PS Form 3800, August 2006 (*Reverse*) PSN 7530-02-000-9047